

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

Mar 21, 2023

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9 UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF WASHINGTON
11

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 BRYCE QUINTON HALE,

16 Defendant.

Case No.: 1:21-CR-2052-SAB-1

SUPERSEDING INDICTMENT

18 U.S.C. § 2251(a), (e)
Production of Child Pornography
(Count 1)

18 U.S.C. § 2252A(a)(2)(A), (b)(1)
Distribution of Child Pornography
(Count 2)

18 U.S.C. § 2252A(a)(2)(A), (b)(1)
Receipt of Child Pornography
(Count 3)

18 U.S.C. § 2252A(a)(5)(B), (b)(2)
Possession of Child Pornography
(Count 4)

18 U.S.C. § 3147
Penalty for an Offense Committed
While on Pretrial Release

18 U.S.C. § 2253
Forfeiture Allegations

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SUPERSEDING INDICTMENT - 1

1 The Grand Jury charges:

2 COUNT 1

3 Between on or about August 2, 2021, and on or about August 6, 2021,
4 within the Eastern District of Washington, the Defendant, BRYCE QUINTON
5 HALE, did knowingly employ, use, persuade, induce, entice, and coerce Minor A
6 to engage in sexually explicit conduct, as defined in 18 U.S.C. § 2256(2)(A), for
7 the purpose of producing a visual depiction of such conduct, knowing and having
8 reason to know that such visual depiction would be transported and transmitted,
9 using any means and facility of interstate and foreign commerce, and in and
10 affecting interstate and foreign commerce; such visual depiction was produced and
11 transmitted using materials that had been mailed, shipped and transported in and
12 affecting interstate and foreign commerce by any means, including by computer;
13 and such visual depiction was actually transported and transmitted, using any
14 means and facility of interstate and foreign commerce, and in and affecting
15 interstate and foreign commerce, in violation of 18 U.S.C. § 2251(a), (e).

16 COUNT 2

17 On or about August 6, 2021, within the Eastern District of Washington, the
18 Defendant, BRYCE QUINTON HALE, did knowingly distribute child
19 pornography, as defined in 18 U.S.C. § 2256(8)(A), that had been mailed, shipped
20 and transported in and affecting interstate and foreign commerce by any means,
21 including by computer, and that was transported via any means or facility of
22 interstate and foreign commerce, to wit: still image and video files depicting minor
23 and prepubescent children engaging in sexually explicit conduct, including but not
24 limited to the lascivious exhibition of their genitals and pubic areas, as defined in
25 18 U.S.C. § 2256(2)(A), all in violation of 18 U.S.C. § 2252A(a)(2)(A), (b)(1).

COUNT 3

Between on or about June 5, 2022, and on or about January 6, 2023, within the Eastern District of Washington, the Defendant, BRYCE QUINTON HALE, did knowingly receive child pornography, as defined in 18 U.S.C. § 2256(8)(A), that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and that was transported via any means or facility of interstate and foreign commerce, to wit: still image and video files depicting minor and prepubescent children engaging in sexually explicit conduct, including but not limited to the lascivious exhibition of their genitals and pubic areas, as defined in 18 U.S.C. § 2256(2)(A), in violation of 18 U.S.C. § 2252A(a)(2)(A), (b)(1).

COUNT 4

On or about January 6, 2023, within the Eastern District of Washington, the Defendant, BRYCE QUINTON HALE, did knowingly possess material that contained one or more images of child pornography, as defined in 18 U.S.C. § 2256(8)(A), including images of prepubescent minors and minors who had not attained twelve years of age, the production of which involved the use of a minor engaging in sexually explicit conduct, and which visual depictions were of such conduct, that had been mailed, and shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, in violation of 18 U.S.C. § 2252A(a)(5)(B), (b)(2).

1 SENTENCING ENHANCEMENT

2 While the Defendant, BRYCE QUINTON HALE, was on pretrial release
3 pursuant to an order dated December 1, 2021, from the United States District Court
4 for the Eastern District of Washington, Case No. 1:21-CR-2052-SAB-1, and signed
5 an advice of penalties which notified the Defendant of the potential effect of
6 committing an offense while on pretrial release, the Defendant committed the
7 offenses charged in Counts 3 and 4 of this Superseding Indictment, in violation of
8 18 U.S.C. § 3147.

9 NOTICE OF FORFEITURE ALLEGATIONS

10 The allegations contained in this Superseding Indictment are hereby
11 realleged and incorporated by reference for the purpose of alleging forfeitures.

12 Pursuant to 18 U.S.C. § 2253, upon conviction of an offense or offenses in
13 violation of 18 U.S.C. § 2251(a), (e); and/or 18 U.S.C. § 2252A(a)(2)(A), (b)(1),
14 and/or 18 U.S.C. § 2252A(a)(5)(B), (b)(2), as set forth in this Superseding
15 Indictment, the Defendant, BRYCE QUINTON HALE, shall forfeit to the United
16 States any visual depiction described in section 2251, 2251A, 2252, 2252A,
17 2252B, or 2260, or any book, magazine, periodical, film, videotape, or other matter
18 which contains any such visual depiction, which was produced, transported,
19 mailed, shipped or received in violation of this chapter; any property, real or
20 personal, constituting or traceable to gross profits or other proceeds obtained from
21 such offenses; and, any property, real or personal, used or intended to be used to
22 commit or to promote the commission of such offenses, or any property traceable
23 to such property, including, but not limited to:

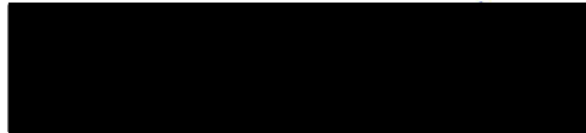
- 24 - a Quantum Fireball 3.5" hard disk drive, Serial Number 173002311914;
25 - a Quantum Fireball 3.5" hard disk drive, Serial Number 136918370881;
26 - a Toshiba Internal Disk Drive, Serial Number 855OT88LT;

27 //

- a White Google Pixel 3 phone; and
- a Motorola Moto G Stylus phone.

DATED this 21st day of March 2023.

A TRUE BILL



Vanessa Waldref

Vanessa R. Waldref
United States Attorney

David Herzog for Michael Murphy

Michael D. Murphy
Assistant United States Attorney